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January 17, 2024

VIA ECF/PDF

The Honorable Jessica G. L. Clarke
United States District Court
500 Pearl Street, Room 1040
New York, New York 10007-1312

Re: Doe v. Combs, et al., Case No. 1:23-cv-10628 (JGLC)

Dear Judge Clarke:

We are the attorneys for Defendants Sean Combs, Daddy's House Recording Studio, Inc., and Bad Boy Entertainment Holdings, Inc. (collectively, the "Combs Defendants") in the above-referenced action.

On December 11, 2023, Plaintiff moved for entry of an Order permitting her to proceed anonymously as a "Jane Doe" (the "Motion"). [Dkt. Nos. 14-17.] Although the Combs Defendants are opposing the Motion, they seek to seal Defendants' Memorandum of Law in Opposition to Plaintiff's Motion to Proceed Anonymously (the "Opposition Brief") out of an abundance of caution.

In accordance with Rule 5(e) of the Court's Individual Rules and Practices in Civil Cases, the Combs Defendants submit this letter-motion to respectfully request leave to file, under seal, the Opposition Brief. We have met and conferred with Plaintiff's counsel, who consents to the requested relief. The Opposition Brief is simultaneously filed with this letter-motion.

The Opposition Brief does not reveal Plaintiff's name, but it does refer to certain facts about Plaintiff that the Combs Defendants have learned because her identity was disclosed by Plaintiff's counsel. *See* Opp. Br. at 1, 2, 17. The facts included are pertinent to the Motion, but the Combs Defendants want to disclose them under seal to avoid any possibility that a third party could recognize Plaintiff's identity before the Motion is decided. Plaintiff has a public-facing identity that could be potentially determined from the content of the Opposition Brief.

The Combs Defendants request this relief only for so long as the Motion is *sub judice*. If the Court denies Plaintiff's Motion, the Combs Defendants submit that the Opposition Brief should be unsealed and made part of the public docket. If it is granted, then it should remain sealed in the Court's discretion.

The Honorable Jessica G. L. Clarke
January 17, 2024
Page 2

We thank the Court for its consideration of this requested relief.

Respectfully submitted,

/s/Jonathan D. Davis

Jonathan D. Davis

JDD:hs

cc: Douglas H. Wigdor, Esq.
Scott E. Leemon, Esq.